

Tuesday, May 28, 2002

Linda Pardy
Environmental Scientist
Water Quality Standards Unit
Regional Water Quality Control Board

Re: Comments on TMDL for Diazinon in the Chollas Creek Watershed

Dear Ms. Pardy:

On behalf of Environmental Health Coalition (EHC), I am writing to comment on the April 2002 Draft Basin Plan Amendment and Technical Report for the Total Maximum Daily Load for Chollas Creek Watershed, San Diego County, California.

Environmental Health Coalition is pleased that the Regional Board is taking action to eliminate diazinon toxicity in waterways of the Chollas Creek watershed, and reduce the use of this dangerous pesticide. Diazinon poses a serious threat to water quality, non-target organisms, as well as human health.ⁱ

Our comments are focused on the TMDL implementation plan outlined in the report.

While the USEPA's phase-out agreement with manufacturers of diazinon is likely to significantly reduce diazinon contamination in the Chollas Creek watershed over the next several years, additional measures to curtail diazinon use such as those outlined in the TMDL implementation plan are valuable and necessary for the following reasons:

- Measures outlined in the TMDL implementation plan that promote Integrated Pest Management (IPM) strategies and result in the use of less toxic alternatives to diazinon prevent the danger of getting onto a "pesticide treadmill", where the elimination of one compound results in substitution of a pesticide that also creates hazards for human health and the environment; and
- While the EPA phase-out agreement is scheduled to end sales of diazinon to retailers by mid-2003, retail stocks and consumer stocks of diazinon are likely to continue to contaminate the watershed for several more years.
- Continued contamination of the watershed may result from use of diazinon bought across the border in Mexico.

Though the goal of this TMDL is to reduce diazinon toxicity in waterways of the Chollas Creek watershed, the implementation plan should reflect the wider concerns for human health and the

environment that prompted the EPA phase-out of diazinon. We encourage the Regional Board to emphasize pollution prevention in its implementation plan. Integrated Pest Management strategies that minimize the use of pesticides prevent the danger of increased use of toxic alternatives to diazinon, and protect human health and non-target organisms.

An IPM Framework for Pollution Prevention

An emphasis on pollution prevention in the implementation plan requires that a clear distinction be made between pest control strategies that prevent the use of pesticides and those that encourage safe-handling of pesticides, and that priority is given to pesticide use prevention.

In the TMDL implementation plan, the use of the term 'Best Management Practices' (BMPs) to cover both types of pest control strategies is confusing. In our understanding, the term BMP in the context of water quality protection describes the handling of a hazardous material in a manner that reduces discharge to surface waters. In section 11.20-3-b (Page 35) of the report, this definition of BMP seems to apply in the statement "The plan should consist of pollution prevention and source control best management practices designed to reduce discharge to the creek."

In Attachment F of the report, however, the term 'Best Management Practices' is used to describe not only handling practices that reduce surface water contamination, but also pollution prevention strategies commonly used in an Integrated Pest Management framework. Also, Attachment F does not provide a guide for prioritizing the different strategies, so that in the attachment, practices that use diazinon in a manner that reduces discharge to the creek, but still can harm human health and non-target organisms, are given equal footing with practices that use alternatives to pesticides.

We suggest that BMPs for the safest possible handling of diazinon be recommended only as part of a larger IPM framework that emphasizes pesticide-use prevention before turning to pesticides as a last resort.

This framework would prioritize in order:

1. Prevention of indoor and outdoor pests.
2. Use of nontoxic or less toxic alternatives.
3. Minimize hazards of pest control products used (this is where the BMPs fit)

Specific suggestions for Attachment F

1. Add to the website list: www.pesticide.org/default.htm , the website for the Northwest Coalition for Alternatives to Pesticides. The site has free, downloadable PDF files on alternative control measures for a wide variety of pests. This site is especially suitable for the general public, who aren't likely to go to the trouble of sending for the BIRC publications, for example.

2. The Seattle Natural Lawn Care Campaign is a good model for agencies pooling resources to do an effective public educational campaign that includes mass media and more interactive approaches.
3. The IPM marketing workshop for pest control businesses should include information on how to make money without applying pesticides, such as development of contracts for inspection and monitoring services and sanitation and repair recommendations to avoid pest problems.
4. Likewise, facilities managers need sample contracts to hire pest control services that charge for prevention of pest problems rather than application of pesticides.

IPM education and outreach-Attachment M

Attachment M describes many effective public education strategies. We suggest that the topics to be covered include not only the water quality but also the human health effects and other environmental impacts of diazinon. Also, the health and environmental effects of other organophosphates, carbamates, pyrethrins, and other pesticides that may be likely substitutes for diazinon should be covered.

Other suggestions

The TMDL implementation plan should include an evaluation plan for determining the efficacy of public outreach efforts. Monitoring of Chollas Creek will provide an indication of the level of diazinon use in the watershed, but an evaluation of the outreach efforts specifically could help improve outreach programs, and determine if other pesticides of concern are being substituted for diazinon. Such an evaluation could take the form of a survey of users targeted in the outreach programs.

EHC supports the implementation of a buy-back program, that includes IPM education and outreach, to address the probable 'stockpiling' of diazinon due to more aggressive marketing prior to the EPA ban, and the potential for consumers to be wary of losing access to a familiar product.

Thank you for considering our comments.

Sincerely,

Joy Williams
Research and Community Assistance Director

¹ United States Environmental Protection Agency. Risk Assessment for Diazinon.
<<http://www.epa.gov/pesticides/op/diazinon.htm>> Accessed May 22, 2002.

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Re: Addendum to Comments on TMDL for Diazinon in the Chollas Creek Watershed

Dear Ms. Pardy:

Per the phone message I left you today, I was able to speak with one of our staff members about some additional comments EHC has on the April 2002 Draft Basin Plan Amendment and Technical Report for the Total Maximum Daily Load for Chollas Creek Watershed, San Diego County, California. I apologize for any inconvenience.

EHC encourages the Regional Water Quality Control Board to evaluate issuing general or individual permits to large users of diazinon in the Chollas Creek watershed. Such permits could direct users to implement Integrated Pest Management strategies to prevent their use of diazinon and potentially toxic pesticide alternatives. Facilities targeted for such permits could include those with large turf areas, such as golf courses and cemeteries, and facilities containing large numbers of structures, given the importance of structural pest control as a source of diazinon contamination.

Also, EHC suggests that the Regional Board use the opportunity of this TMDL to promote the adoption of Integrated Pest Management policies by the City of San Diego and the other co-permittees identified in the TMDL.

Thank your for considering our additional comments.

Sincerely,

Melanie McCutchan
Research Associate
